



Wildlife Management Institute

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August 9, 2004

NE NPR-A Amendment Planning Team
Alaska State Office
Bureau of Land Management
222 West 7th Avenue
Anchorage, Alaska 99513-7599

Dear Planning Team:

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I am writing to provide the comments of the Wildlife Management Institute (WMI) on the Bureau of Land Management (BLM) Northeast National Petroleum Reserve-Alaska (NPR-A) Draft Amended Integrated Activity Plan/Environmental Impact Statement (IAP/EIS). WMI, founded in 1911, is a private, nonprofit, scientific and educational organization staffed by experienced natural resource professionals dedicated to improving the management of wildlife and wildlife habitat in North America.

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General

The 1998 Environmental Impact Statement and decision by the BLM made 87 percent of the 4.6 million-acre northeast planning area available to oil and gas leasing, but designated 857,859 acres of sensitive tundra and wetland habitats around Teshekpuk Lake for protection. Nearly 600,000 acres of this Teshekpuk Lake Surface Protection Area was closed to oil and gas leasing to safeguard caribou, geese and other wildlife resources. In our judgment, this decision maintains an appropriate balance between oil and gas development and protection of wildlife and their habitats in the northeast portion of the NPR-A.

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Basic

The BLM's stated premise for its proposal to revise the 1998 plan for the Northeast NPR-A is that it "has conducted various scientific studies on the biological resources of the area in cooperation with the North Slope Borough, the State of Alaska, and other federal agencies," and that "[i]nformation gained since the completion of the NE plan has led BLM to conclude that it is appropriate to consider amending it." WMI is not aware of any information that would lead to such a conclusion. The BLM should substantiate its statement in the 2003 scoping notice by providing this information to the public and demonstrating how it supports the stated conclusion.

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Purpose

The purposes of the proposed amendment to the 1998 plan are "(1) to evaluate exploration and development opportunities that could provide access to significant new oil discoveries, while remaining sensitive to biological and subsistence values, and (2) to consider

changing the current prescriptive stipulations into a mixture of prescriptive and performance-based stipulations similar to those being developed for the Northwest portion of the National Petroleum Reserve.” However, the preferred alternative (Alternative B) resulting from the BLM evaluation and consideration would significantly disrupt the balance between oil and gas development and protection of wildlife and their habitats in the northeast portion of the NPR-A, to the detriment of the wildlife resources.

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Birds

The Teshekpuk Lake area is used as a traditional molting site for 50,000 to 90,000 geese, including as much as 30 percent of the entire Pacific population of brant and up to 35,000 of the Mid-continent white-fronted geese that breed on the North Slope. Geese, pintails, and tundra swans using this area move through the Central and Mississippi Flyways during the fall and provide highly valued opportunities for recreational hunting and wildlife viewing. The level at which these opportunities are able to continue in the future depends in part on the level of disturbance associated with oil and gas development in geese molting areas of the Northeast NPR-A because geese are vulnerable to disturbance by people and aircraft during their flightless, energy-demanding molt.

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Birds

The preferred alternative – Alternative B -- identified by the BLM in its new proposal would substantially increase the amount of disturbance to molting geese by reducing the area closed to oil and gas leasing in the Teshekpuk Lake Surface Protection Area from 857,859 acres to 213,000 acres. The effect of the change to the 1998 decision proposed by Alternative B would be to expose large proportions of molting brant, white-fronted geese and Canada geese to the effects of oil and gas leasing, exploration and development. The National Research Council, for example, found in its 2003 report on the cumulative effects of oil and gas activities on Alaska’s North Slope, “If development moves into the Teshekpuk Lake area of the National Petroleum Reserve-Alaska, molting waterfowl could be adversely affected, especially brant.” A July 2004 analysis by the U.S. Geological Survey (USGS) Alaska Science Center of the effects of the preferred alternative estimates that over the last 5 years the percentage of molting brant, white-fronted geese, and Canada geese that would be in leased and borderline areas has averaged 44.7, 37.5, and 50.2 percent, respectively. The effects on molting brant are of even greater concern because the USGS analysis found that “numerically a large number of molting brant are found outside the no-lease area in years of poor productivity on breeding areas.” Consequently, the greater magnitude of disturbance that would accompany this expanded oil and gas development is likely to result in reduced populations of brant and white-fronted geese and reduced recreational opportunities.

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Birds

WMI shares the concern of the Pacific Flyway Council that expanded oil and gas impacts could accelerate the decline of the Western High Arctic population of brant, which uses the Teshekpuk Lake area during molt. One of the smallest goose populations in North America, these brant currently are within 4,000 birds of a threshold established to restrict all hunting rangewide. These potential impacts and others of the expanded oil and gas leasing proposal have led the Council to recommend that “the sensitive goose molting area should not be offered for

leasing,” and that the Teshekpuk Lake area “be given permanent protection from future development by Secretarial designation.” WMI concurs.

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Caribou

In addition to molting geese, the Teshekpuk Lake Surface Protection Area was established to protect habitats used by caribou for calving and insect relief. Although current numbers of the Teshekpuk Lake caribou herd are high, WMI has concerns about the cumulative effects on caribou population size from potential impacts of oil and gas development and climate change. Oil and gas development appears to have the greatest potential for adverse effects by interfering with caribou moving through narrow corridors from insect relief areas to foraging areas.

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For the reasons provided above, the BLM should retain the current protections in the entire Teshekpuk Lake Surface Protection Area by adopting Alternative A – No Action, and reject the preferred alternative (Alternative B) in the IAP/EIS.

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Thank you for your consideration of WMI’s comments on the IAP/EIS. Please keep us informed at the address on this letterhead of any matters related to it.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert P. Davison", with a long horizontal flourish extending to the right.

Robert P. Davison, Ph.D.
Northwest Field Representative